

EXHIBIT B

Fonseca, Helena

From: Emmy Levens <elevens@cohenmilstein.com>
Sent: Friday, June 21, 2019 11:45 AM
To: Travis.Gamble@dbr.com; jweiner@cohenmilstein.com
Cc: tleopold@cohenmilstein.com; mpitt@pittlawpc.com; jconnors@SusmanGodfrey.com; hunter@napolilaw.com; CStern@levylaw.com; Wayne.Mason@dbr.com
Subject: RE: Carthan - LAN/LAD Response Deadline

Travis,

As we just discussed, in light of Phil's health emergency, Class Plaintiffs are fine with this extension. We appreciate your representation that you'll work with us to diligently move discovery forward given the Court's schedule. We hope Phil is feeling better soon.

All the best,

Emmy

From: Gamble, Travis S. [mailto:Travis.Gamble@dbr.com]
Sent: Friday, June 21, 2019 9:31 AM
To: Jessica Weiner <jweiner@cohenmilstein.com>
Cc: Theodore Leopold <tleopold@cohenmilstein.com>; Mpitt <mpitt@pittlawpc.com>; jconnors@SusmanGodfrey.com; Emmy Levens <elevens@cohenmilstein.com>; hunter <hunter@napolilaw.com>; Stern, Corey <CStern@levylaw.com>; Mason, Wayne B. <Wayne.Mason@dbr.com>; Gamble, Travis S. <Travis.Gamble@dbr.com>
Subject: Carthan - LAN/LAD Response Deadline
Importance: High

Ms. Weiner,

I, along with Wayne Mason and Phil Erickson, represent the LAN and LAD defendants in the Flint litigation. As you are aware, LAN/LAD was served with Requests for Production by Plaintiffs on May 14, 2019, and obtained a brief (10 day) extension to serve its responses - making them due this Monday, June 24, 2019. Throughout the past month, Phil Erickson has been responsible for preparing LAN/LAD's responses and corresponding document production and was in the process of getting them ready for production by the current Monday deadline.

Unfortunately, we just learned this morning that Phil is experiencing a significant medical condition and was taken to the Emergency Room this morning. While I am presently unaware of his condition, out of professional courtesy, the LAN/LAD defendants would request another brief extension to finalize their discovery responses and arrangements for the corresponding document production. Although I understand from your prior emails to Phil that plaintiffs are generally wary of granting extensions, we believe this is an exceptional circumstance and would ask for an additional two weeks to get the responses/documents served.

Thank you in advance for your consideration and please let me know your position as soon as you can so that we can avoid having to draft a motion.

Travis S. Gamble
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